

Comment Submission 9

March 25, 2002

RECEIVED

WA State Energy Facilities
Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172

APR 01 2002

ENERGY FACILITY SITE
EVALUATION COUNCIL

RE: Response to Comments on Wallula Power Project

Dear Sirs:

I am in receipt of your March 12, 2002 letter responding to the comments I submitted regarding the Wallula Power Project. I appreciate your detailed comments and responses to my concerns. However, there are a couple of issues that I feel have not been adequately addressed.

It is clear from your letter that I will have "minimal impacts", that those impacts will occur "primarily" south of Dodd Road and that "adverse impacts to growing conditions to all crops are very unlikely".

This area is a dry arid climate. The study (Section 3.2) referring to Cooling Tower Plume Droplet Deposition states "this additional water deposition would be insignificant compared to the normal rainfall during the summer and autumn months (0.5 to 1.0 inch per month)". This assessment of the amount of rainfall in this area is in error. Our summers are extremely dry and usually without rainfall. I would suggest that your team access the PAWS weather stations located in my immediate area for accurate statistics.

9-1

Approximately one-third of Buchanan property is located within plumes 3 or less, representing hours of fogging annually. It would only take less than an hour of high humidity to seriously impair the ability to produce top quality crop (i.e. Timothy Hay and Alfalfa). It appears that your proposal increases the likelihood of such an occurrence. I would like a guarantee that such an occurrence will not take place.

9-2

The moisture of high humidity can cause serious problems for my cherry crops, which are located within the boundaries of the proposed plume. These problems can range from splitting to mold/mildew. I am not convinced by the information provided that my crops will not be impacted. We need to know hourly and/or per minute release rates, not averages but actual rates of release, in order to make a more clear and precise determination regarding impact of my property.

9-3

I also have concerns regarding salt deposition on any crops that I may raise. Your study indicates that the nearest cherry orchard is on the Lundgren property. It appears from your study that the one corner of our property, containing a cherry orchard, is located between plumes 0.1 and 0.2 of Figure 3.2-3. This translates to a definite impact for the Buchanan property. It is my understanding that the water located within the wells on Boise Cascade property is contaminated. I would like a guarantee that there will be no impact to any of our crops.

9-4

9-5

Please define "primarily" in regard to the impact of the cooling tower plume. Plumes may create a shade over much of Buchanan property, which will block our necessary sunlight, regardless of whether the cloud is directly over our property or not.

9-6

Finally, the overall temperature of the Buchanan property may be increased from many different activities related to this project. A very slight increase in temperature could make the cherry blossoms bloom prematurely. This is also true with other types of fruit trees. This may become a situation that cannot be reversed, regardless of expensive efforts to save the crop. An example of this is during a north-northeast wind (e.g. arctic air blasts). Since the plant is proposed to be located to the south of my property, the heat it produces would not be of any benefit. In my experience, while traveling on Highway 12 at Boise Cascade, the temperature jumps 4 to 6 degrees when you are downwind of the plant. I would like a guarantee that there will be no impacts to the Buchanan property from temperature variances.

9-7

In closing, any properties that relinquish their water rights for this facility should be required to become habitat, permanently relinquishing agricultural activities.

9-8

I think that it might be beneficial to everyone involved if this site were relocated between the existing utilities, approximately 5 to 7 miles away. Relocation of this facility may allow it to be located in an area that will not impact anyone.

9-9

I would like the opportunity to address your council in person. Please let me know when I may do so. I appreciate your timely response to my concerns.

Sincerely,

Randy Buchanan Danna Buchanan Wayne Buchanan
Randy Buchanan

35030 W. Highway 12
Burbank, WA 99323

cc: Dave Mastin
Ron Levin
Port of Walla Walla

Responses to Comment Submission 9, Letter from Randy Buchanan, Burbank, WA

- 9-1. The Wallula area is arid with low summertime rainfall. Historical data for summertime precipitation in the area (obtained from National Weather Service records) are as follows:

Average Monthly Precipitation (inches per month)

Station	May	June	July	August
Walla Walla	1.6	1.0	0.6	0.8
Kennewick	0.6	0.4	0.16	0.4
Ice Harbor Dam	0.9	0.7	0.24	0.5

The applicant used the Seasonal/Annual Cooling Tower Impact Program (SACTIP) model to estimate droplet deposition at the Dodd Road cherry orchards. The modeled summertime rate was 0.0002 inches per month. The modeled deposition is insignificant compared to any of the baseline precipitation rates listed in the above table.

- 9-2. The applicant's SACTIP modeling shows it is unlikely that droplet deposition, shading, and increased humidity from the cooling towers would affect growing and drying of hay or alfalfa. Droplet deposition would be a small fraction of existing summertime rainfall rates. Plume shadowing during the summer would occur for only a few hours per season. Water vapor from the cooling towers would add approximately 5% to existing naturally occurring water vapor blowing past the region.
- 9-3. Section 3.2 has been revised to more specifically include humidity and plume location in relation to the Buchanan cherry orchards. Please see Chapter 3 of this Final EIS for updated text.
- 9-4. Section 3.2 discusses potential impacts caused by salt deposition from the cooling towers. The applicant has agreed to install a water treatment system on the cooling tower recirculation system

to reduce salt emissions in the cooling tower drift. The modeled salt deposition rates are much lower than threshold values recognized to pose an impact to agriculture.

- 9-5. Water that would be withdrawn from the wells at the Boise Cascade fiber farm would be used at the plant site, a few miles from the area where the water is removed. With the exception of a small amount of water that would be used at the plant site for employee drinking and sanitary waste, essentially all of that water would evaporate, either during the cooling process or from the evaporation ponds. The water would not be released to the ground or groundwater as it currently is when it is applied for irrigation. Therefore, there is very little potential for contaminating groundwater as a result of the plant's water use. Also, the pumping from these wells is expected to result in less overall drawdown than currently, so there is little potential for impact to crops from lowering of the water table.
- 9-6. Section 3.2 in Chapter 3 of this Final EIS describes plume shading. The SACTIP model accounts for plume shading during periods when a visible steam plume passes nearby (but not directly overhead) and obscures a low sun angle.
- 9-7. Section 3.2 has been updated to address temperature impacts to the cherry orchards. Please see Chapter 3 of this Final EIS for updated text.
- 9-8. The applicant proposes to convert the Boise Cascade fiber farm land that is acquired to natural vegetation. Also, by conversion of the water rights for industrial use for the operation of the power plant, the applicant would not have the authority to use water available to grow crops on this land.
- 9-9. Chapter 2 of the Draft EIS described the process used to determine the optimal project characteristics (including location) with the aim

of limiting adverse impacts while still meeting the purpose and need for the project. The process used to develop alternatives, to eliminate alternatives from further analysis, and to modify the Proposed Action is presented in that chapter. Several sites were considered as possible locations for the Wallula Power Project, but the selected site was the only location identified in the southeastern portion of Washington that met all six screening criteria considered appropriate by the applicant (see Section 2.4.1 of the Draft EIS).